

STANDARD INSPECTION REPORT OF A GAS DISTRIBUTION OPERATOR RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

Operator: AMEREN ILLINOIS COMPANY	Operator ID#: 32513
Inspection Date(s): 5/6/2014, 5/7/2014	Man Days: 2
Inspection Unit: Kewanee	
Location of Audit: Kewanee	
Exit Meeting Contact: John Sigler	
Inspection Type: Standard Inspection - Record Audit	
Pipeline Safety Representative(s): Kevin Hecker	
Company Representative to Receive Report: Michael Fuller	
Company Representative's Email Address: mfuller2@ameren.com	

Headquarters Address Information:	300 Liberty Peoria, IL 61602 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Ron Pate Phone#: (217) 424-6518 Email:	
Inspection Contact(s)	Title	Phone No.
John Sigler	Quality Assurance Consultant	

Gas System Operations	Status
Gas Transporter	Ameren Illinois
Annual Report (Form 7100.1-1) reviewed for the year:	Not Checked
<u>General Comment:</u> <i>Staff reviewed Ameren's annual report (covering all legacy companies and operating centers) during the Annual Report audit conducted at the ICC office in Springfield, IL. No issues were identified during that audit.</i>	
Unaccounted for Gas	.53%
Number of Services	825576
Miles of Main	16888
Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	Not Checked

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<u>General Comment:</u>		
MAOP records are housed at Decatur Plaza and were reviewed during a previous audit.		
Operating Pressure (Feeder)	various	
<u>General Comment:</u>		
Ameren Kewanee's operating center serves multiple towns. Operating pressures vary depending on the transmission pipeline feeding the system.		
Operating Pressure (Town)	various	
<u>General Comment:</u>		
Ameren Kewanee's operating center serves multiple towns. Operating pressures vary from town to town.		
Operating Pressure (Other)	Not Applicable	
<u>General Comment:</u>		
Ameren classifies the operating pressures as either "Town" or "Feeder", therefore "other" operating pressures are not applicable to Ameren LaSalle.		
MAOP (Feeder)	Not Checked	
<u>General Comment:</u>		
MAOP records are housed at Decatur Plaza and were reviewed during a previous audit.		
MAOP (Town)	Not Checked	
<u>General Comment:</u>		
MAOP records are housed at Decatur Plaza and were reviewed during a previous audit.		
MAOP (Other)	Not Checked	
<u>General Comment:</u>		
MAOP records are housed at Decatur Plaza and were reviewed during a previous audit.		
Does the operator have any transmission pipelines?	No	
<u>General Comment:</u>		
There are no Ameren-owned transmission pipelines within Ameren Kewanee's territory.		
Regulatory Reporting Records		Status
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
<u>General Comment:</u>		
There were no reportable incidents within the Ameren Kewanee Operating territory in 2013.		
[191.9(a)]	Was a DOT Incident Report Form F7100.1 submitted within 30 days after detection of an incident?	Not Applicable
<u>General Comment:</u>		

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<i>There were no reportable incidents within the Ameren Kewanee Operating territory in 2013.</i>		
[191.9(b)]	Were any supplemental incident reports submitted when deemed necessary?	Not Applicable
<u>General Comment:</u> <i>There were no reportable incidents within the Ameren Kewanee Operating territory in 2013, therefore no supplemental reports were required.</i>		
Did the operator have any plastic pipe failures in the past calendar year?		No
<u>General Comment:</u> <i>Ameren Kewanee did not have any plastic pipe failures during 2013.</i>		
Did the operator take action to mitigate safety concerns relating to the failure of the PE or pipeline components?		Not Applicable
<u>General Comment:</u> <i>Ameren Kewanee did not have any plastic pipe failures during 2013.</i>		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<u>General Comment:</u> <i>There were no safety related conditions identified in 2013.</i>		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<u>General Comment:</u> <i>There were no safety related conditions identified in 2013.</i>		
[192.16(c)]	Customer Notification: Has the operator notified each new customer within 90 days about the customer's responsibility regarding buried piping, however, operators of a master meter may continuously post a general notice in a permanent location?	Not Checked
<u>General Comment:</u> <i>Ameren Illinois sends all new customers notification of responsibility at the time the customer signs up for service. This notification is in addition to any brochures distributed as part of Ameren's Public Awareness Plan.</i>		
DRUG TESTING		Status
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<u>General Comment:</u> <i>A review of Ameren's drug and alcohol plan was completed in 2011 and not part of this audit.</i>		
TEST REQUIREMENTS		Status
[192.517(a)][192.505,192.507,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Not Checked

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<u>General Comment:</u>		
High pressure distribution and transmission records are housed at Decatur Plaza and were reviewed during a previous audit.		
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Satisfactory
<u>General Comment:</u>		
Staff reviewed pressure test records from 2013 and identified no deficiencies.		
[192.603(b)][192.725]	Were service lines temporarily disconnected from the main properly tested prior to reconnection?	Satisfactory
<u>General Comment:</u>		
Service lines are tested prior to reconnection. Staff reviewed service order records from 2012 and 2013, indicating that lines were retested from the point of disconnection to the riser.		
UPRATING		Status
<u>Category Comment:</u>		
There were no uprating activities within the Ameren Kewanee territory in 2013.		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	Not Applicable
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	Not Applicable
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	Not Checked
<u>General Comment:</u>		
The operator was able to provide records from the Subject Matter Reference Meetings that were conducted throughout 2013. These records were reviewed during a previous audit at the Pawnee Operating Center in February 2014.		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		Not Checked
<u>General Comment:</u>		
The operator was able to show that the OQ plan review is part of the Subject Matter Reference Meetings. These records were reviewed during an audit at the Pawnee Operating Center in February 2014.		
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	Satisfactory
<u>General Comment:</u>		
The laptops in each truck contain the records and maps of the gas system, as well as some of the operating history. Supervisors have access to additional operating history information at the Operating Center if necessary.		
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	Not Checked

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<u>General Comment:</u> <i>This is done by Quality Assurance Personnel and supervisors during company field audits. Staff reviewed 2013 Quality Assurance Results during the Pawnee Operating Center audit conducted in February 2014.</i>		
CONTINUING SURVEILLANCE RECORDS		Status
[192.603(b)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other unusual operating and maintenance conditions?	Satisfactory
<u>General Comment:</u> <i>Staff review patrol records for 2013. No deficiencies were found.</i>		
[192.491][192.489]	Does the operator have records verifying if exposed cast iron was examined for evidence of graphitization and if necessary what appropriate action was taken concerning graphitization?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping within Ameren Kewanee's operating territory.</i>		
[192.603(b)][192.755]	Does the operator have surveillance records of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating and maintenance conditions?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping within Ameren Kewanee's operating territory.</i>		
[192.603(b)][192.753(a)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of more than 25 (psig.) sealed as required?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping within Ameren Kewanee's operating territory.</i>		
[192.603(b)][192.753(b)]	Is each cast iron caulked bell and spigot joint that is subject to a pressure of 25 (psig.) or less and is exposed for any reason sealed as required?	Not Applicable
<u>General Comment:</u> <i>There is no cast iron piping within Ameren Kewanee's operating territory.</i>		
QUALIFICATION OF PIPELINE PERSONNEL		Status
<u>Category Comment:</u> <i>A review of Ameren's OQ Plan and records will be conducted during an audit at a later date.</i>		
Refer to operator Qualification Inspection Forms and Protocols		Not Checked

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<u>General Comment:</u> <i>A review of Ameren Illinois' OQ plan was conducted in the Pawnee operating center in February 2014.</i>		
DAMAGE PREVENTION RECORDS		Status
<u>Category Comment:</u> <i>These records were reviewed during a record audit at the Pawnee Operating Center in February 2014.</i>		
[192.603(b)][191.11(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	Not Checked
Has the number of damages increased or decreased from prior year?		Not Checked
[192.603(b)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	Not Checked
[192.603(b)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	Not Checked
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		Not Checked
Do pipeline operators include performance measures in facility locating contracts?		Not Checked
[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? http://www.icc.illinois.gov/julie/	Not Checked
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Not Checked
If no, were Common Ground Alliance Best Practices discussed with Operator?		Not Checked
EMERGENCY PLANS		Status
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	Satisfactory
<u>General Comment:</u> <i>The Emergency Plan is reviewed January of each year by all company employees. All employees have access to the emergency plan at all times.</i>		
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	Satisfactory
<u>General Comment:</u> <i>Ameren documents training, including emergency training, with an electronic online system.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	Satisfactory

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<u>General Comment:</u>		
<i>Reviews are conducted and documented by supervisors as well as QA personnel after an emergency. Ameren Kewanee did not experience any emergency situations 2013.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	Satisfactory
<u>General Comment:</u>		
<i>This documentation was reviewed during a previous audit at the Pawnee Operating Center in February 2014.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	Not Checked
<u>General Comment:</u>		
<i>Staff reviewed emergency response intervals during a previous audit at Ameren's Pawnee operating center.</i>		
PUBLIC AWARENESS PROGRAM - RECORDS		Status
<u>Category Comment:</u>		
<i>A review of Ameren Illinois' Public Awareness Program was conducted at the Pawnee operating center in February 2014.</i>		
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
ODORIZATION OF GAS		Status
[192.603(b)][192.625(f)]	Has the operator maintained documentation of odorant concentration level testing using an instrument?	Satisfactory
<u>General Comment:</u>		
<i>Staff reviewed odorant concentration levels for 2013. No deficiencies were found.</i>		
[192.603(b)][192.625(e)]	Has the operator maintained documentation of odorizer tank levels?	Unsatisfactory
<u>NOPV Comment:</u>		
<i>Staff reviewed documentation of odorant tank levels for 2013. Records for November 2013 indicate that the odorant usage at the Ophiem odorant station was .46lbs/MMCF for the month: well below the minimum rate of .65lbs/MMCF. Comments indicate the cause as "grain dryer load".</i>		
[192.603(b)][192.625(f)(1)]	Are master meter operators receiving written verification of odorant concentration levels from their gas supplier?	Not Applicable
<u>General Comment:</u>		
<i>Ameren Kewanee is not a master meter operator.</i>		
[192.603(b)][192.625(f)(2)]	Has the master meter operator maintained documentation of sniff tests performed as required by this section?	Not Applicable
<u>General Comment:</u>		

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Ameren Kewanee is not a master meter operator.

PATROLLING & LEAKAGE SURVEY		Status
[192.603(b)][192.721(b)(1)]	Is the operator patrolling business districts at a minimum of 4 per year/4 1/2 months?	Satisfactory
General Comment: Ameren Kewanee has determined that business district surveys are only required once annually. 2013 records indicate the entire business district was patrolled.		
[192.603(b)][192.721(b)(2)]	Is the operator patrolling outside business districts at a minimum of 2 per year/7 1/2 months?	Not Applicable
General Comment: There are no pipelines within Ameren Kewanee's operating territory that apply to this code part.		
[192.603(b)][192.723(b)(1)]	Is the operator performing leakage surveys in business districts at a minimum of 1 per year/ 15 months? If the operator has inside meter sets that meet this criterion then were those surveyed?	Satisfactory
General Comment: Staff reviewed Leakage Survey records for 2013. In order to determine if inside meter sets were included in the survey, addresses of inside meter sets were selected randomly and confirmed on survey records. No deficiencies were found.		
[192.603(b)][192.723(b)(2)]	Is the operator performing leakage surveys outside a business district at a minimum of every 5 years/63 months? Is the operator performing leakage surveys on cathodically unprotected pipelines at a minimum of every 3 years/39 months? If the operator has inside meter sets that meet this criterion then were those surveyed? If the operator has yard lines then are those being surveyed?	Satisfactory
General Comment: Staff reviewed surveys for areas outside of the business district. The only unprotected pipeline is a short section of main and 9 services in the city of Wyand. Ameren Kewanee was able to provide proof that this part of the system was leak surveyed in 2013.		
YARD LINES - RESIDENTIAL		Status
[220 ILCS 2.2.03]	Has the operator designated and documented the location of all services where the meter is located more than 3 feet away from the wall of a residence?	Satisfactory
[192.463,220 ILCS 2.2.03][220 ILCS 2.2.03]	Has the operator determined if cathodic protection is required on these services?	Satisfactory
[192.723(b)(1),192.723(b)(2)][220 ILCS 2.2.03]	After the determination of the cathodic protection requirements, has the operator surveyed each line within the required leakage survey intervals?	Satisfactory
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected	Not Applicable

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	from all sources and supplies of gas, and purged of gas?	
General Comment: <i>Ameren Kewanee did not have any pipeline abandoned in place during 2013.</i>		
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Applicable
General Comment: <i>Ameren Kewanee did not have any pipeline made inactive during 2013.</i>		
[192.603(b)][192.727(d)]	Did the operator maintain documentation demonstrating that whenever service to a customer was discontinued access to gas was either; locked, prevented by a mechanical fitting, or disconnected from the gas supply and open pipe ends sealed?	Satisfactory
General Comment: <i>Ameren uses a computerized service order system to record services that are locked off and the method used. (typically services are pin-locked)</i>		
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Satisfactory
General Comment: <i>Separate documentation for purging is done only on high pressure distribution and transmission lines. Engineering typically writes up a "purge plan", however this is not done for distribution.</i>		
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable
General Comment: <i>There are no abandoned pipelines crossing navigable waterways within Ameren Kewanee's operating territory.</i>		
PRESSURE LIMITING AND REGULATION		Status
[192.603(b)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Staff reviewed regulator inspections for 2013. No deficiencies were found.</i>		
[192.603(b)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	Satisfactory
General Comment: <i>Staff was able to confirm regulators are checked annual for capacity. These inspections are listed as "engineering evaluations" in Ameren's GCS system.</i>		

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[192.603(b)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>Staff was able to confirm regulators are checked annual for capacity. These inspections are listed as "engineering evaluations" in Ameren's GCS system.</i>		
[192.603(b)][192.741(a),192.741(b)]	Is each distribution system supplied by more than one district pressure regulating station, or where required by the operator on a system supplied by a single regulating station, equipped with telemetering or recording pressure gauges to indicate the gas pressure in the district?	Satisfactory
<u>General Comment:</u> <i>These records are housed in the Peoria office and will be reviewed at a later date.</i>		
[192.603(b)][192.741(c)]	If there were indications of abnormally high- or low-pressure, were actions taken to correct any unsatisfactory operating conditions?	Not Checked
<u>General Comment:</u> <i>These records are housed at Decatur Gas Control. A review of these records will be conducted at a later date.</i>		
[192.603(b)][192.743(a),192.743(b),192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	Yes
<u>General Comment:</u> <i>Each take point within the Ameren Kewanee operations territory is protected by an over pressure relief valve.</i>		
[192.603(b)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	Not Checked
<u>General Comment:</u> <i>The operator does verify this information, however, the records for capacity verification are housed at the Peoria operating center. These records will be reviewed during the next record audit in Peoria.</i>		
VALVE MAINTENANCE		Status
[192.603(b)][192.747(a),192.747(b)]	Did the operator inspect and maintain distribution valves necessary for the safe operation of the system at a minimum of 1 per year/15 months?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed valve inspections from 2013 with no issues identified.</i>		
[192.603(b)][192.749(a)]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u> <i>There are no vaults within Ameren Kewanee's gas system.</i>		
Investigation Of Failures		Status

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[192.603(b)][192.617]	Did the operator experience accidents or failures requiring analysis?	Not Applicable
<u>General Comment:</u> No failures requiring analysis occurred in Ameren's Kewanee operating territory in 2013.		
WELDING OF STEEL PIPE		Status
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	Satisfactory
<u>General Comment:</u> The operator's welding procedures are included in the O&M in the section titled, WELD - Welding.		
[192.603(b)][192.227,192.229]	Does the operator have documentation of welder qualification documentation as required?	Not Checked
<u>General Comment:</u> Staff reviewed documentation of welder qualification/re-qualification during a record audit at the Pawnee Operating Center in February 2014.		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	Not Checked
<u>General Comment:</u> The NDT records were reviewed at a previous audit at Decatur Plaza.		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	Not Checked
<u>General Comment:</u> The NDT records were reviewed at a previous audit at Decatur Plaza.		
JOINING OF MATERIAL OTHER THAN WELDING		Status
[192.603(b)][192.285]	Are persons making joints with plastic pipe qualified?	Satisfactory
<u>General Comment:</u> The operator was able to provide documentation of qualification for persons making plastic joints. These records were reviewed during an audit at the Pawnee Operating Center in February 2014.		
[192.603(b)][192.287]	Are persons inspecting plastic pipe joints qualified?	Satisfactory
<u>General Comment:</u> The operator was able to provide documentation of qualification for persons inspecting plastic joints. These records were reviewed during an audit at the Pawnee Operating Center in February 2014.		
[192.603(b)][192.283]	Are qualified joining procedures for plastic pipe in place?	Satisfactory
<u>General Comment:</u> The joining procedures are located in section "POLY - Polyethylene Pipe" of the operator's O&M.		
CORROSION CONTROL RECORDS		Status

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[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system?	Not Checked
<u>General Comment:</u> <i>Ameren maintains an electronic mapping system (GCS) which includes some of this information. Complete records are housed in Peoria and will be reviewed at a later date.</i>		
[192.491][192.459]	Has the operator maintained documentation of an examination when buried pipe was exposed?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed many buried pipe examination forms. No deficiencies were identified.</i>		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	Satisfactory
<u>General Comment:</u> <i>Staff was able to review Ameren's CTS Corrosion tracking system and spot checked several CP survey entries. No deficiencies were found.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	Satisfactory
<u>General Comment:</u> <i>All rectifiers are in Kewanee all other towns in operating territory are anode protected.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	Not Applicable
<u>General Comment:</u> <i>There are no interference bonds (critical or non-critical) within Ameren Kewanee's system.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	Not Applicable
<u>General Comment:</u> <i>There are no interference bonds (critical or non-critical) within Ameren Kewanee's system.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	Satisfactory
<u>General Comment:</u> <i>There is no unprotected pipeline within Ameren Kewanee's territory.</i>		

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[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation at casings?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed the corrosion records for casings. All records that were reviewed indicated that isolation and CP readings are taken annually at casings.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	Satisfactory
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	Not Applicable
<u>General Comment:</u> <i>There were no instances of test leads becoming electrically inconducive in 2013.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	Not Applicable
<u>General Comment:</u> <i>Ameren identifies these as "adjacent foreign crossings", and check them annually.</i>		
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	Not Checked
<u>General Comment:</u> <i>Corrosion records including coupons are housed at Decatur Plaza. These records were reviewed during a previous audit.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	Not Checked
<u>General Comment:</u> <i>Corrosion records including coupons are housed at Decatur Plaza. These records were reviewed during a previous audit.</i>		
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	Not Checked
<u>General Comment:</u> <i>Corrosion records including coupons are housed at Decatur Plaza. These records were reviewed during a previous audit.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	Satisfactory
<u>General Comment:</u>		

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Unless otherwise noted, all code references are to 49CFR Part 192.

If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<i>The operator completes atmospheric corrosion surveys as part of leak surveys. The documentation from the leak survey "daily sheets" include details such as disbonded coating, need for paint, condition/position of riser, etc.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	Satisfactory
<u>General Comment:</u> <i>Staff reviewed documentation of atmospheric corrosion issues identified during a previous leak survey, then used the GCS system to track the work order number associated with the issue to verify work was completed.</i>		
[192.491][192.483(a), 192.483(b), 192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	Satisfactory
<u>General Comment:</u> <i>No pipe in the Ameren Kewanee operating territory was removed due to external corrosion, however, all steel repair pipe used in Ameren's system is coated. The O&M stipulates that cathodic protection is applied to the repaired pipeline within 1 year, however, Ameren LaSalle's system utilizes rectifiers so cathodic protection is verified at the time of repair.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<u>General Comment:</u> <i>Ameren Illinois utilizes an electronic records system of training completed. This shows all company training, date of completion and includes reminders for when next training session is due.</i>		
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	Satisfactory
<u>General Comment:</u> <i>These training records were reviewed in Pawnee Operating Center during a previous audit in February 2014.</i>		
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	Satisfactory
<u>General Comment:</u> <i>Ameren Kewanee is not a municipal operator.</i>		
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	Satisfactory
<u>General Comment:</u> <i>Updates to procedures are released bi-annually. These updates include new materials, new methods of operation and installation, and general procedures.</i>		

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